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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) Case No. CR 13-0444 RS
Plaintiff,)
v.) STIPULATION AND [PROPOSED]
ADOREAN BOLEANCU,) PROTECTIVE ORDER
Defendant.)
)

STIPULATION

The United States and the defendant in this action, through undersigned counsel, hereby stipulate and agree as follows:

1. The United States is prepared to produce to defendant's counsel of record in this matter discovery containing sensitive tax, personal, and/or financial information of third parties, subject to the following conditions.

2. No counsel of record shall disclose any documents or information produced by the United States to anyone except his or her client, any defense investigators or any defense staff working on the case, and no defendant, defense investigator, or defense staff shall disclose such documents or information to anyone, absent further order of the Court.

**STIPULATION AND [PROPOSED]
PROTECTIVE ORDER, Case No. CR 13-0444 RS**

1 3. The documents and information described above shall be used only to prepare and
2 evaluate the defense in this proceeding. Any person to whom the documents or information are
3 disclosed must be provided with a copy of this Stipulation and Order. The materials provided to defense
4 counsel pursuant to this Stipulation and Order, and any copies thereof, shall be returned to the
5 government at the conclusion of this case or shall be destroyed, with defense counsel certifying
6 destruction. In addition, defense counsel shall be permitted to maintain in his electronic client file one
7 copy of the confidential records for a period of seven years consistent with his obligations as an attorney
8 licensed in California. This Stipulation and Order shall be appended as the first page of that electronic
9 file which shall be segregated and noted as a CONFIDENTIAL FILE: SUBJECT TO PROTECTIVE
10 ORDER.

11 4. The documents described above shall not be copied unless copying is necessary for
12 preparation of the defense in this proceeding. Any copy of the materials that is made shall be
13 accompanied at all times by a copy of this Stipulation and Order

14 | DATED: July 29, 2013

Respectfully submitted,

MELINDA HAAG
United States Attorney

/S/

ROBERT S. LEACH
Assistant United States Attorney

COLEMAN & BALOGH LLP

/s/

ETHAN A. BALOGH
Attorney for Defendant Adorean Boleancu

ORDER

In light of the stipulation and agreement of the parties to this action, and good cause appearing therefor, it is HEREBY ORDERED that disclosure of the above-described information shall be restricted as set forth in Paragraphs 1 through 4 above.

Dated: 7/30/13


Hon. Richard Seeborg
United States District Judge